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Attorneys for Defendant FX Drilling, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
FX DRILLING COMPANY, INC.,
Defendant.

CAUSE NO. CR 16-20-GF-BMM
DEFENDANT FX DRILLING, INC.'S
MOTION TO ENTER GUILTY PLEA

COMES NOW Defendant FX Drilling, Inc. ("FX Drilling"), by and through its counsel of record, Mark D. Meyer of Ugrin, Alexander, Zadick and Higgins, P.C. and Jeffrey C. Corey of Parsons Behle & Latimer, LLC, and hereby moves the Court to allow it to enter a plea of guilty to the charges alleged in Counts I and II

of the Indictment, namely, Negligent Discharge of Oil into Waters of the United States in a Quantity that May Be Harmful, in violation of 33 U.S.C. §§ 1321(b)(3), 1319(c)(1)(A), and Failure to Immediately Notify Appropriate Federal Agency of Discharge of Oil into Waters of the United States in a Quantity that May Be Harmful, in violation of 33 U.S.C. § 1321(b)(5), 18 U.S.C. § 2.

As set forth in more detail in the parties' Joint Motion for Expedited Sentencing, FX Drilling and the United States have reached a plea agreement pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure.¹ As also detailed in the parties' Joint Motion for Expedited Sentencing, and assuming the Court accepts FX Drilling's guilty plea, the parties are requesting that the Court proceed to sentencing immediately following the entry of a guilty plea. To allow the parties adequate time to submit position statements and other information to the Court relevant to sentencing, and to accommodate scheduling conflicts, the parties are requesting that the Court schedule this matter for a change of plea and sentencing hearings on **Friday, July 22, 2016.**

A proposed Order to schedule a hearing and deadlines for submission of sentencing positions has been submitted with the parties Joint Motion to Expedite Sentencing.

DATED this 12th day of July, 2016

¹ A copy of the Plea Agreement is attached as Exhibit A to the separately-filed Joint Motion to Expedite Sentencing.

By: /s/ Mark D. Meyer

Mark D. Meyer

Ugrin, Alexander, Zadick & Higgins, P.C.

Attorneys for Defendant FX Drilling, Inc.

By: /s/ Jeffrey C. Corey

Jeffrey C. Corey, admitted *Pro Hac Vice*

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